



for sex-reassignment surgery.”<sup>1</sup> In contrast, as Dr. Román has declared in this case, modern European democracies such as Sweden have taken steps that “resulted in essentially a ban on puberty blockers, cross-sex hormones, and surgeries in children” in all but the most exceptional cases and in research that Plaintiffs have not argued is happening in Tennessee. [Román (Doc. 113-6) ¶¶ 33-39.] The Tennessee General Assembly appropriately responded to VUMC’s profit-motivated practices by enacting legislation that protects all minors in our State.

Even if this Court repeats *Ladapo*’s mistakes, that decision did not provide the sweeping relief that Plaintiffs in this case have requested. *Ladapo* preliminarily enjoined certain Florida officials from “tak[ing] any steps to prevent the administration of GnRH agonists or cross-sex hormones to” *only* the three minor plaintiffs in that case. 2023 WL 3833848, at \*17. Such a limited injunction is not “a facial injunction prohibiting Defendants from enforcing the Ban” against parties and nonparties alike, regardless of whether healthcare providers are treating the minor Plaintiffs who requested the preliminary injunction here. Private Plaintiffs’ Reply 12.

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<sup>1</sup> *Economist*, *Why Iran is a hub for sex-reassignment surgery* (Apr. 4, 2019), <https://www.economist.com/middle-east-and-africa/2019/04/04/why-iran-is-a-hub-for-sex-reassignment-surgery>.

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### **CERTIFICATE OF SERVICE**

I hereby certify that on June 9, 2023, the undersigned filed the foregoing document via this Court's electronic filing system, which sent notice of such filing to the following counsel of record:

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